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11 UNITED STATES OF AMERICA

12
13 UNITED STATES DISTRICT COURT
14 FOR THE CENTRAL DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 JUAN CARLOS GUTIERREZ,
19 aka "Johnny G,"

20 Defendant.
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Case No. 2:23-CR-197(A)-SB

JOINT PROPOSED VERDICT FORM

[DISPUTED]

Indictment: 4/25/23
First Superseding Indictment: 11/29/23
Pretrial Conference: 3/26/24 at 8:00 a.m.
Trial: April 9, 2024 at 8:30 a.m.
Last Day: May 25, 2024

24 Plaintiff United States of America, by and through its counsel of record, the
25 United States Attorney's Office for the Central District of California and Assistant
26 United States Attorneys Jeremy K. Beecher and Danbee C. Kim, and defendant Juan
27 Carlos Gutierrez, by and through his counsel of record, Federal Public Defender
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Cuauhtemoc Ortega and Deputy Federal Public Defender Anne O'Toole, hereby submit
their disputed joint proposed verdict forms.

Dated: March 12, 2024

Respectfully submitted,

E. MARTIN ESTRADA
United States Attorney

MACK E. JENKINS
Assistant United States Attorney
Chief, Criminal Division

/s/

JEREMY K. BEECHER
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Assistant United States Attorneys

Attorneys for Plaintiff
UNITED STATES OF AMERICA

Dated: March 12, 2024

/s/

CUAUHTEMOC ORTEGA
Federal Public Defender
ANNE O'TOOLE
Deputy Federal Public Defender

Attorneys for Defendant
JUAN CARLOS GUTIERREZ

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12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 JUAN CARLOS GUTIERREZ,
16 aka “Johnny G,”
17 Defendant.

Case No. 2:23-CR-197(A)-SB

VERDICT FORM

[GOVERNMENT’S PROPOSAL]

COUNT ONE

1. We, the Jury, unanimously find the defendant JUAN CARLOS GUTIERREZ (check one):

☐ NOT GUILTY

☐ GUILTY

of distributing fentanyl on or about December 9, 2021, as charged in Count One of the indictment.

(If the response to Question 1 is Guilty, you must also answer Questions 2 and 3.)

2. Having found defendant JUAN CARLOS GUTIERREZ guilty of distribution of fentanyl as charged in Count One, we further unanimously find that Steven Ryback's use of fentanyl distributed by defendant JUAN CARLOS GUTIERREZ resulted in Steven Ryback's serious bodily injury:

☐ NO

☐ YES

3. Having found defendant JUAN CARLOS GUTIERREZ guilty of distribution of fentanyl as charged in Count One, we further unanimously find that Steven Ryback's use of fentanyl distributed by defendant JUAN CARLOS GUTIERREZ resulted in Steven Ryback's death:

☐ NO

☐ YES

DATED _____ in Los Angeles, California

FOREPERSON OF THE JURY

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12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 JUAN CARLOS GUTIERREZ,
16 aka "Johnny G,"
17 Defendant.

Case No. 2:23-CR-197(A)-SB
VERDICT FORM
[DEFENDANT'S PROPOSAL]

COUNT ONE

1. We, the Jury, unanimously find the defendant JUAN CARLOS GUTIERREZ (check one):

☐ NOT GUILTY

☐ GUILTY

of distributing fentanyl on or about December 9, 2021, as charged in Count One of the indictment.

(If the response to Question 1 is Guilty, you must also answer Question 2.)

2. Having found defendant JUAN CARLOS GUTIERREZ guilty of distribution of fentanyl as charged in Count One, we further unanimously find that Steven Ryback's use of fentanyl distributed by defendant JUAN CARLOS GUTIERREZ resulted in Steven Ryback's death:

☐ NO

☐ YES

DATED _____ in Los Angeles, California

FOREPERSON OF THE JURY